

Attn: Diana Messina, Senior Engineer
Central Valley Regional Water Quality Control Board
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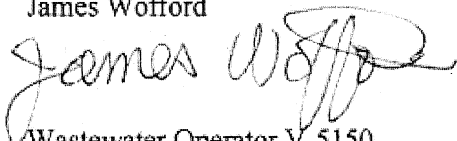
March 6, 2009

COMMENTS ON TENTATIVE WASTE DISCHARGE REQUIREMENTS FOR
DONNER SUMMIT PUD WASTEWATER TREATMENT PLANT (NPDES
PERMIT No. CA0081621)

The option offering DSPUD wastewater treatment plant dilution credit for
Nitrates should be rejected.

- 1) It is backsliding from the 2002 NPDES order limit of 10mg/l Nitrates
- 2) All other wastewater treatment plants in the general region of the Yuba, Bear and North Fork American Rivers' mountain watersheds have had the same 10mg/l Nitrates numerical standard with no dilution credits granted since the 2002 round of permit renewals.
- 3) The flow data referenced in calculating dilution credit are unreliable and based on a flow gauge far downstream from plant discharge. At times in reality there is virtually no flow in the receiving stream at the discharge point.
- 4) At least one serious water quality degrading biostimulation incident is well documented (June 2008) and very likely was caused by DSPUD wastewater effluent due in part to the Nitrates discharged.

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